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June 18, 2012

VIA ECF

The Honorable Kiyo A. Matsumoto
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Lodge v. United Homes, LLC, et. al.*
Case No. 05 Civ. 187 (KAM)(RLM)

Dear Judge Matsumoto:

We represent defendants Bayview Loan Servicing, LLC, Bayview Asset Management, LLC, U.S. Bank, N.A. as trustee for Bayview Asset-Backed Securities Trust Series 2007-30, Bayview Financial, L.P., and Bayview Financial Management Corp. (collectively, the "Bayview Defendants") in the above-referenced action. As directed, together with counsel for plaintiff Mary Lodge ("Lodge"), we are writing to Your Honor with a status of our settlement discussions.

As a preliminary point, we have agreed to "bifurcate" the mortgage foreclosure issue and the legal fee issue and will proceed to settlement discussions on the issues separately. At the moment, we have not settled the legal fee issue.

However, with respect to the mortgage foreclosure issue, we have agreed in principle to a resolution of the foreclosure proceedings which ultimately will render the motions currently pending before the Court moot. We will order a title search for the property to determine whether a deed in lieu of foreclosure or a consensual foreclosure will satisfy the requirements of each party. We are ordering that title search this week, the return of which should take approximately 7-10 business days.

I will be out of the office beginning this Friday, June 22 through next Friday, June 29. It is respectfully requested, therefore, that the Court provide us until July 9 to provide another status report at which time we hope to have the mortgage foreclosure issue fully resolved.

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Thank you for your patience and assistance in this matter. We are available for a conference with the Court if Your Honor so desires.

Respectfully submitted,

/s/ Timothy J. Fierst

Timothy J. Fierst

TJF:me

cc: All Counsel (Via ECF)